



Wednesday, October 24, 2018

Attn: Records Coordinator  
Missouri Attorney General's Office  
Supreme Court Building  
207 W. High St.  
P.O. Box 899  
Jefferson City, MO 65102  
Phone: 573-751-3321  
Facsimile: 573-751-0774

To Whom It May Concern,

The following request is being made in accordance with Missouri's Sunshine Law (Section 610.011.1, RSMo Supp 2006) and all other Missouri open records laws.

### **I: Requested Records**

I am requesting copies of the following records.

**Incoming-And-Outgoing Email Correspondence Between Brad Johnson And The Email Addresses And/or Domains Listed Below From May 2017 Through October 2018.** I am requesting copies of incoming-and-outgoing email correspondence between Brad Johnson and the email addresses listed below from May 23, 2017, through October 24, 2018.

- [JDH2017@ago.mo.gov](mailto:JDH2017@ago.mo.gov)
- [hawleyjd@missouri.edu](mailto:hawleyjd@missouri.edu)
- [Jhawley@stanford.edu](mailto:Jhawley@stanford.edu)
- [Jhawley@yahoo.com](mailto:Jhawley@yahoo.com)
- [joshhawley@gmail.com](mailto:joshhawley@gmail.com)

**Incoming-And-Outgoing Email Correspondence Between Evan Rosell And The Email Addresses And/or Domains Listed Below From January 2017 Through March 2018.** I am requesting copies of incoming-and-outgoing email correspondence between Evan Rosell and the email addresses listed below from January 9, 2017, through March 31, 2018.

- [JDH2017@ago.mo.gov](mailto:JDH2017@ago.mo.gov)
- [hawleyjd@missouri.edu](mailto:hawleyjd@missouri.edu)
- [Jhawley@stanford.edu](mailto:Jhawley@stanford.edu)
- [Jhawley@yahoo.com](mailto:Jhawley@yahoo.com)

455 Massachusetts Ave NW, Sixth Floor | Washington, DC 20001 | 202-747-2060 | [www.americanbridgepac.org](http://www.americanbridgepac.org)

*Paid for by American Bridge 21<sup>st</sup> Century. Not authorized by any candidate or candidate's committee*



- [joshhawley@gmail.com](mailto:joshhawley@gmail.com)

**Incoming-And-Outgoing Email Correspondence Between Loree Anne Paradise And The Email Addresses And/or Domains Listed Below From March 2018 Through October 2018.** I am requesting copies of incoming-and-outgoing email correspondence between Loree Anne Paradise and the email addresses listed below from March 1, 2018, through October 24, 2018.

- [JDH2017@ago.mo.gov](mailto:JDH2017@ago.mo.gov)
- [hawleyjd@missouri.edu](mailto:hawleyjd@missouri.edu)
- [Jhawley@stanford.edu](mailto:Jhawley@stanford.edu)
- [Jhawley@yahoo.com](mailto:Jhawley@yahoo.com)
- [joshhawley@gmail.com](mailto:joshhawley@gmail.com)

**Incoming-And-Outgoing Text Message Correspondence And Phone Call Records Between Evan Rosell And Joshua “Josh” Hawley From January 2017 Through March 2018.** I am requesting copies of incoming-and-outgoing phone call records text message correspondence, including, including, but not limited to, messages sent using personal and official office-provided devices and phone numbers between Evan Rosell and Joshua “Josh” Hawley from January 9, 2017, through March 31, 2018.

**Incoming-And-Outgoing Text Message Correspondence And Phone Call Records Between Brad Johnson And Joshua “Josh” Hawley From May 2017 Through October 2018.** I am requesting copies of incoming-and-outgoing text message correspondence, including, but not limited to, messages sent using personal and official office-provided devices and phone numbers between Brad Johnson and Joshua “Josh” Hawley from May 23, 2017, through October 24, 2018.

**Incoming-And-Outgoing Text Message Correspondence And Phone Call Records Between Loree Anne Paradise And Joshua “Josh” Hawley From March 2018 Through October 2018.** I am requesting copies of incoming-and-outgoing phone call records text message correspondence, including, but not limited to, messages sent using personal and official office-provided devices and phone numbers between Loree Anne Paradise and Joshua “Josh” Hawley from March 1, 2018, through October 24, 2018.

## **II: Application to be a media requester**

To help assess my status for copying and mailing fees, please note that I am filing this request as a media entity requestor on the behalf of American Bridge 21<sup>st</sup> Century. American Bridge 21<sup>st</sup> Century is an organization that is, “primarily engaged in disseminating information, urgency to inform the public concerning actual or alleged Federal Government activity.” See 5 U.S.C. § 552(a)(6)(E)(v)(II). Further, our organization will utilize our staffs, “editorial skills to turn the raw materials into a distinct work, and distributes that work to an audience.” See U.S. Code 5 U.S.C. 552a (4) (A) (iii)<sup>1</sup>.

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<sup>1</sup> See also ACLU, 321 F. Supp. 2d at 30 n.5



American Bridge maintains a highly trafficked website that frequently publishes briefings and memos that reports and analyzes the current activities in the White House, U.S. Congress and various Congressional Campaigns. The briefs and our website is reliant on obtaining and utilizing the public records to inform the public about the un-reported activities of our government<sup>2</sup> and its public officials<sup>3</sup>. See U.S. Code 5 U.S.C. 552a (4) (A) (iii).

We are an organization that various media entities has credited with providing research that they based articles and publications on. Thus we can, “demonstrate a solid basis for expecting publication through that entity.”<sup>4</sup> See U.S. Code 5 U.S.C. 552a (4) (A) (iii). In March 2017, the New York Times published a front-page story that stated, “The Walden Group attracted little attention until his nomination to the Supreme Court, when American Bridge, a liberal research group, identified public records about it that linked Judge Gorsuch to Mr. Harvey.”<sup>5</sup> In addition, in January 2017, USA Today published our organization’s work without credit in their article on ExxonMobil, in the section that stated, “The sales were conducted in 2003, 2004 and 2005 by Infineum, in which ExxonMobil owned a 50% share, according to SEC documents unearthed by American Bridge, a Democratic research group.”<sup>6</sup>

Given the preceding and the fact that American Bridge plans not to use the information gained from these records for commercial use, yet instead will analyze, publish and then circulate the information that is gained from these records on our website, social media platform, through briefs, we met all the requirements to be classified as a media requester.

### **III: Request Expense Cap, Denial Protocol And Requester Contact Information**

I realize that certain costs may be applicable to this request. Please contact me when you can provide a payment amount for my requests. In the meantime, I authorize an initial expense cap of \$150 to be accrued.

I also request that you state the specific legal and factual grounds for withholding any documents or portions of documents, should you withhold any. Please identify each document that falls within the scope of this request but is withheld from release.

If requested documents are located in, or originated in, another installation or bureau, I would request that you please refer this request, or any relevant portion of this request, to the appropriated installation or bureau.

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<sup>2</sup> “Josh Mandel Refusing to Comply with Ohio Open Records Law,” American Bridge 21<sup>st</sup> Century, [8/23/2012](#)

<sup>3</sup> “Bridge Briefing,” American Bridge 21<sup>st</sup> Century, [10/2/2012](#)

<sup>4</sup> See also ACLU v. U.S. Dep’t of Justice, 321 F. Supp. 2d 24, 29 n.5

<sup>5</sup> New York Times, [3/14/17](#)

<sup>6</sup> USA Today, [1/10/17](#)



To the extent that the information is available in electronic format, I would prefer to receive that information via email or CD, particularly if providing the information reduces the time or expense involved. Otherwise, I request to receive the information in paper form.

You may fax your response to 202-315-0384 or email it to [FOIA@AmericanBridge.org](mailto:FOIA@AmericanBridge.org). If you wish to call 202-370-1327, please do so between 9AM and 6PM (EST).

Thank you for your time and attention to this matter.

Sincerely,

Liz Charboneau & Phil Munson

American Bridge 21st Century  
455 Massachusetts Avenue  
Suite 650  
Washington, DC 20001  
Phone: 202-370-1327  
Fax: 202-315-0384  
Email: [FOIA@AmericanBridge.org](mailto:FOIA@AmericanBridge.org)